

# Code of Conduct

*We, the RNA people: Our Code, our Values, our Culture*

August 2023



**Dear colleagues,**

CureVac was founded in 2000 as a **pioneer in RNA research**. Where others saw obstacles in developing and producing therapies using RNA technology, we discovered opportunities. This history, our passion for revolutionary research and scientific excellence, our unwavering optimism and focus on constructive, creative solutions continue to shape us today. With our mRNA technology, we aim to deliver on the **promise of innovative next-generation therapies and medicines**.

**People are at the centre of everything we do.** We develop life-changing biopharmaceutical solutions for all people and strive to sustainably improve health and well-being around the world through easy access to our vaccines and medicines. We stand for teamspirit, respectful cooperation and a corporate environment that enables all *RNA people* to contribute and excel to the best of their abilities. CureVac thrives on the openness and uniqueness of our employees, who work together appreciatively and support each other.

In our pursuit of progress and success, we never forget our values. As *RNA people*, we strive to promote **sustainability and the highest standards of ethical behavior and integrity**. Only in this way can we work honestly and fairly together as *RNA people* and with our business partners, and live up to the trust that our patients and our shareholders place in us.

In doing so, this Code of Conduct is intended to serve as a **compass and guideline** for all *RNA people* - from supervisory and executive board members to interns. Our Compliance Officer and the Legal & Compliance Department are available as a point of contact for questions.

As a biopharmaceutical company, we bear a **special responsibility and are a beacon of hope** for many people - we want to live up to this aspiration at all times through our actions and conduct.



---

**We are the *RNA people*** 4

---

**Our Code, our Values, our Culture** 5

---

Our vision, our values 6

Scope of our Code of Conduct 11

How to make the right decision 12

How we treat others 13

Sustainability, environment and human rights 15

We speak up 16

---

**We are Accountable** 18

---

We avoid conflicts of interest 19

We comply with all regulatory and quality requirements 20

We interact ethically with healthcare professionals and patients 22

---

**We Follow the Letter and Spirit of the Law** 23

---

Our responsibility 24

We fight bribery and corruption 26

We protect personal data and adhere to data privacy laws 28

We compete fairly 30

We comply with trade laws 32

We fight money laundering 33

We prevent fraud, cybercrime and terrorist financing 34

---

**We Protect CureVac** 35

---

How to use and protect our company assets 36

We do not engage in insider trading 37

Accurate records and information 39

We are eager to learn 41

---

**Glossary** 42

---

To achieve the purpose and goals of CureVac, it's all about people



**CureVac – one culture, one team:**  
We work in different entities and share the same vision, aims and passion

## We are pioneers striving for scientific excellence to deliver the best RNA products

We are pioneers and passionate about RNA. We do not comfort ourselves with the status quo of medical knowledge and research but think further – way further. Our innovative and pioneering work ethics are embedded in our corporate DNA. Our scientific **focus and engagement** – as we have always focused on finding the best solutions – have led to a revolutionary discovery: RNA's potential as a therapeutic vaccine.

We recognized the potential of our discovery and started successfully exploring the power of RNA for medical purposes. Being innovative, thinking outside the box and moving forward in an interdisciplinary, agile and collaborative way are the pillars of our company and our success. We, as the RNA community, are **open-minded** and our mission is to push the current limits of medical research and revolutionize future medical treatment. To limit ourselves would mean to limit the potential of the RNA for the benefit of human health.

This is our vision, this is our motivation, this is us – the *RNA people*. To achieve these purposes and goals of CureVac, we believe it's all about people and their commitment to our company and their drive to develop the best possible RNA products.

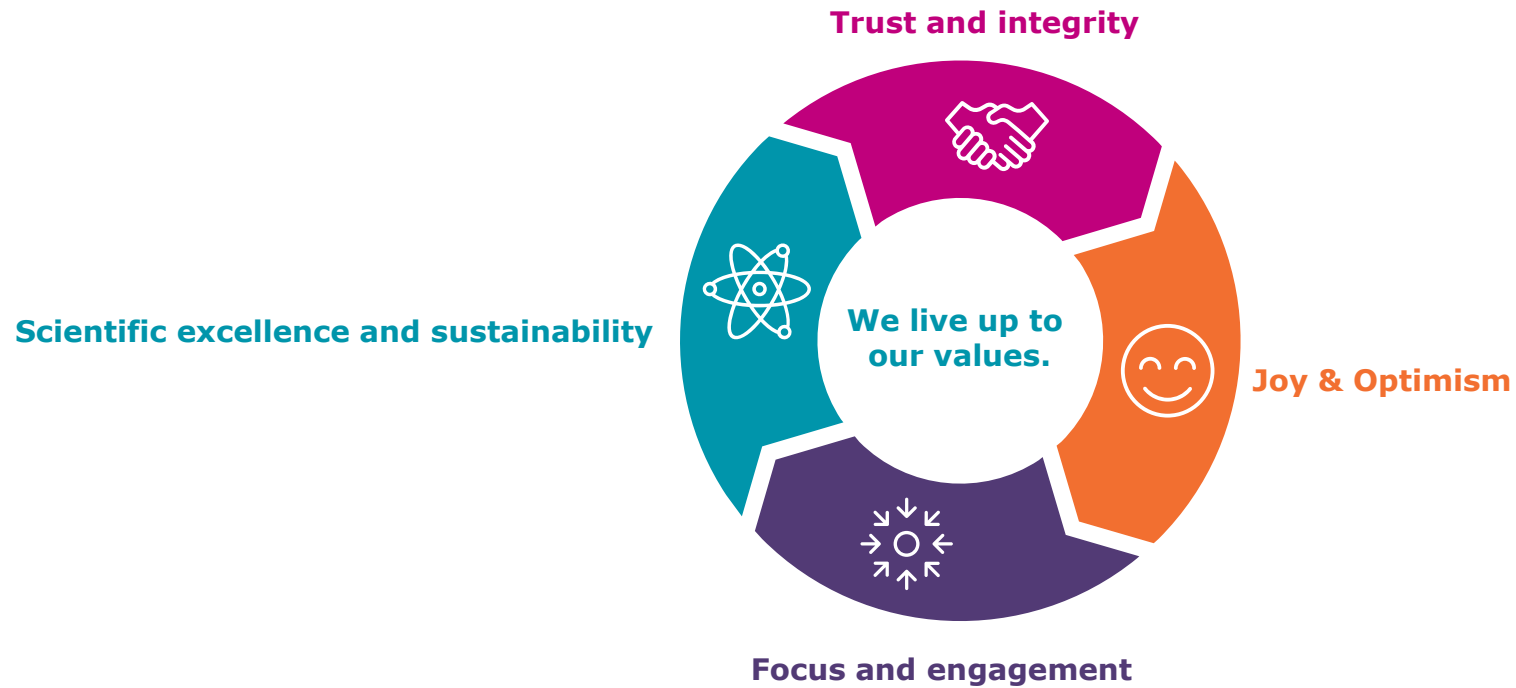
We work in different entities and we all share the same vision, aims and passion. CureVac is our company, we have a common culture and we work together as one team to develop and deliver the highest-quality RNA products possible. As such, this Code of Conduct applies to all of our entities, employees and other personnel.



**Our Code, our Values, our Culture**

# Our vision, our values (1/5)

**Our Code of Conduct is built upon these values and principles and serves as our compass. Our company culture and our interaction with colleagues, investors, customers and business partners are based on our daily commitment to live up to these values.**



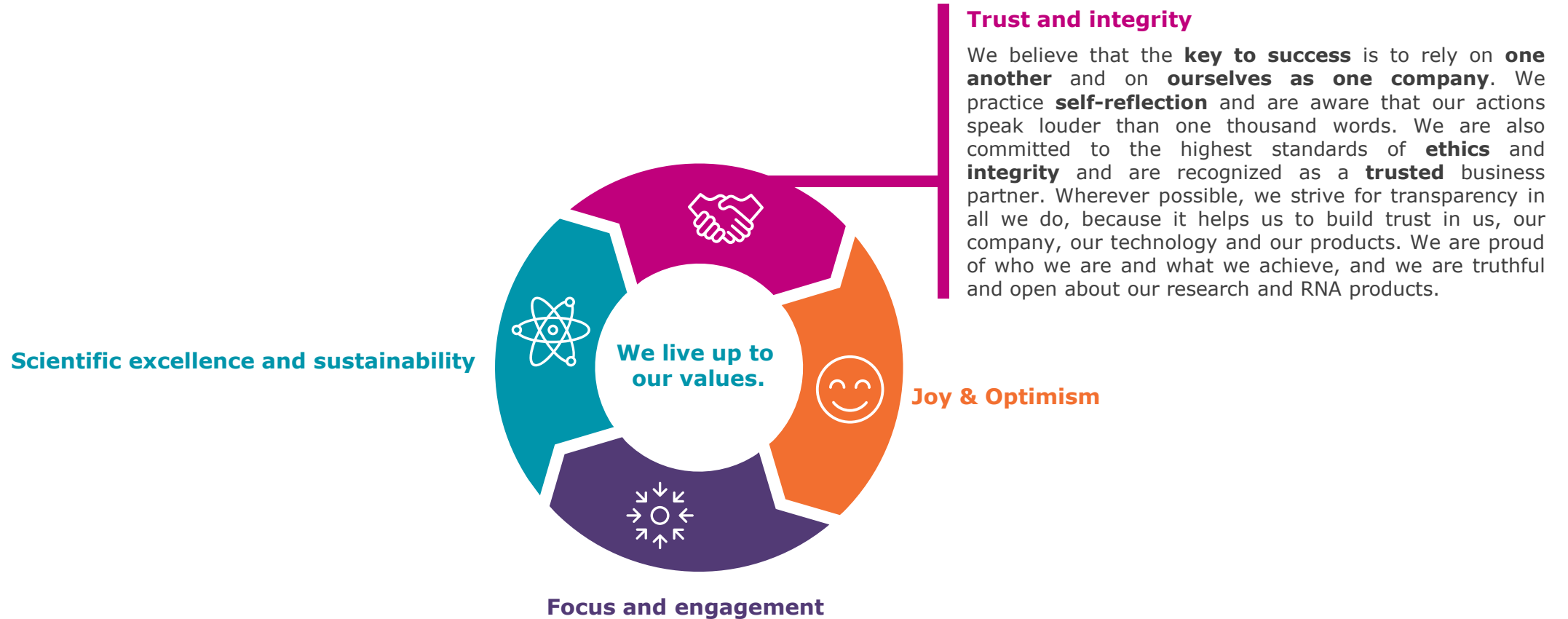
**Our Code of Conduct is built upon these values and principles and serves as our compass. Our company culture and our interaction with colleagues, investors, customers and business partners are based on our daily commitment to live up to these values.**

## Scientific excellence and sustainability

We are dedicated to the highest level of innovation and scientific excellence. Our research is guided by the philosophy of **focus, engagement** and **sustainability**. We strive for **sustainability** and believe that investing in long-standing relationships with our **RNA people** as well as with our business partners offers a long-term reward. We also endeavor to protect the resources of our environment wherever possible, and it is important to us that human rights standards are respected as well as that our RNA products benefit humanity worldwide. We believe that the best way to achieve breakthroughs in the field of RNA is to **focus** on one solution, **engaging** completely and putting all our effort into such solution. To achieve our scientific goals, we always keep an **open and optimistic mindset** and follow the principle of trial and error and the power to learn from errors. After all, research breakthroughs do not often happen by chance, but are the outcome of hard work, long-term planning and the ability to cope with setbacks. We therefore value and encourage our ability to **self-reflect**. We are eager to **learn from any obstacle**, we never stop being innovative, to maintain an **optimistic mindset** and to be **open-minded**. This mindset makes us **pioneers** and leads the way to **scientific excellence**.

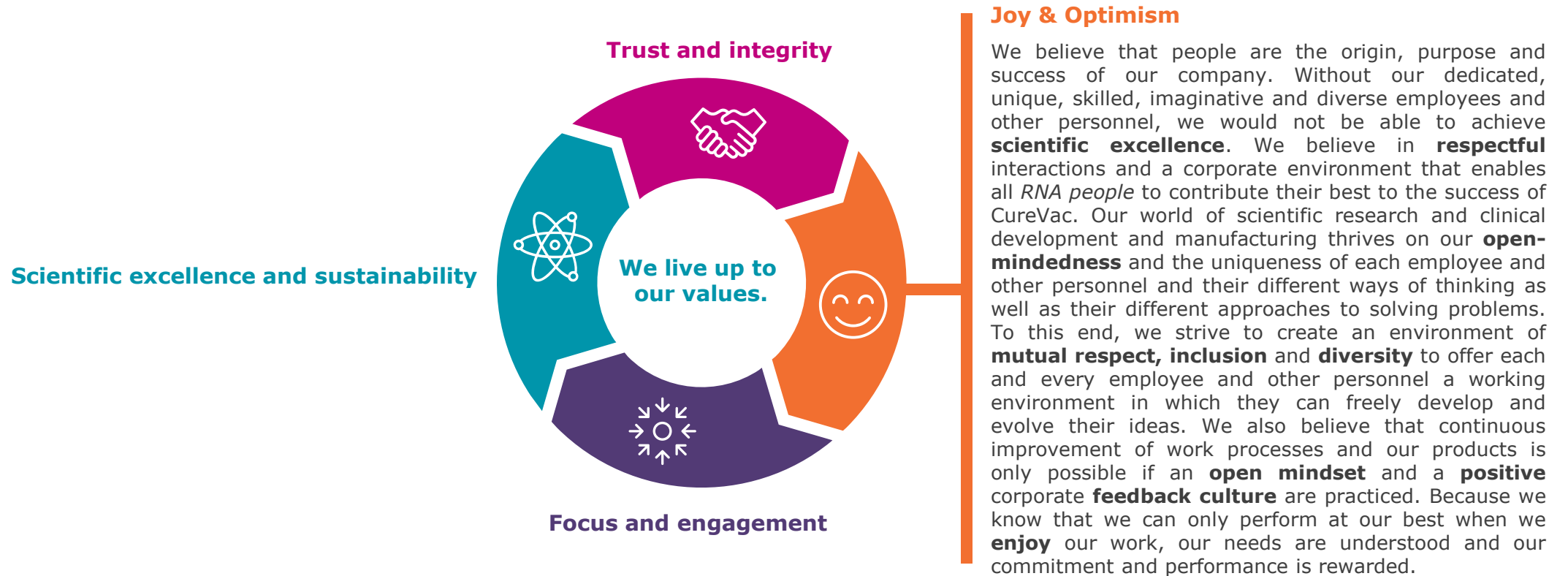


Our Code of Conduct is built upon these values and principles and serves as our compass. Our company culture and our interaction with colleagues, investors, customers and business partners are based on our daily commitment to live up to these values.

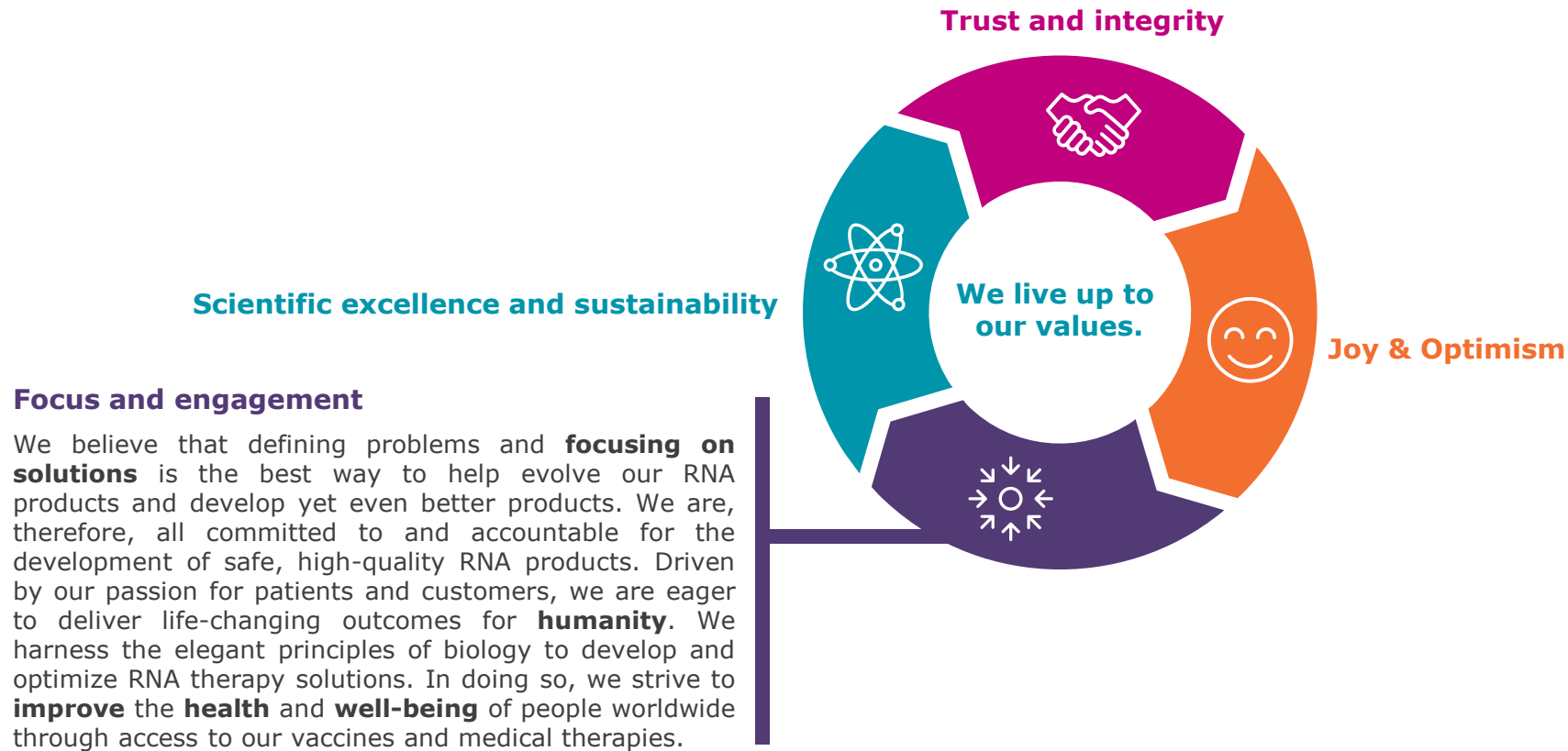




Our Code of Conduct is built upon these values and principles and serves as our compass. Our company culture and our interaction with colleagues, investors, customers and business partners are based on our daily commitment to live up to these values.



Our Code of Conduct is built upon these values and principles and serves as our compass. Our company culture and our interaction with colleagues, investors, customers and business partners are based on our daily commitment to live up to these values.



## Focus and engagement

We believe that defining problems and **focusing on solutions** is the best way to help evolve our RNA products and develop yet even better products. We are, therefore, all committed to and accountable for the development of safe, high-quality RNA products. Driven by our passion for patients and customers, we are eager to deliver life-changing outcomes for **humanity**. We harness the elegant principles of biology to develop and optimize RNA therapy solutions. In doing so, we strive to **improve** the **health** and **well-being** of people worldwide through access to our vaccines and medical therapies.

## Our guiding principles and shared behaviors in the context of the Code of Conduct:



### Focus and engagement

We focus on finding solutions.



### Open-mindedness

We are eager to learn, transparent and always strive to further develop ourselves personally and our company.



### Respect

We express our appreciation to our colleagues, business partners, patients and customers.



### Joy & Optimism

We believe that an optimistic approach and thinking enables more constructive and creative solutions.



### Trust

We act trustworthy. The key to success is our mutual reliance.



### Self-reflection

We practice what we preach, because we believe that our actions speak louder than one thousand words.



### Sustainability

We believe in the importance of long-term relationships, e.g., with our employees and our business partners, and are committed to safeguarding our planet and humanity for future generations.

## How can the Code of Conduct help us?

The Code of Conduct is our road map that helps us stay aligned with our values and ensures that we never lose track. The Code of Conduct explains some of the legal rules we all must abide by and take personal responsibility for. While our Code of Conduct does not cover all situations we may face in our daily work routine, it is intended to serve as a first guide when we encounter an unclear or difficult situation.

In particular, the Code of Conduct enables us to:

- To behave honestly and ethically
- Uphold our values and deepen the trust that is placed in us and our work
- To distinguish the right decision from the wrong one and to make informed choices
- Understand what is expected from us and, if necessary, where to go for guidance
- Understand and comply with the policies and codes of our company
- Understand and comply with laws, regulations and other standards that apply to our company

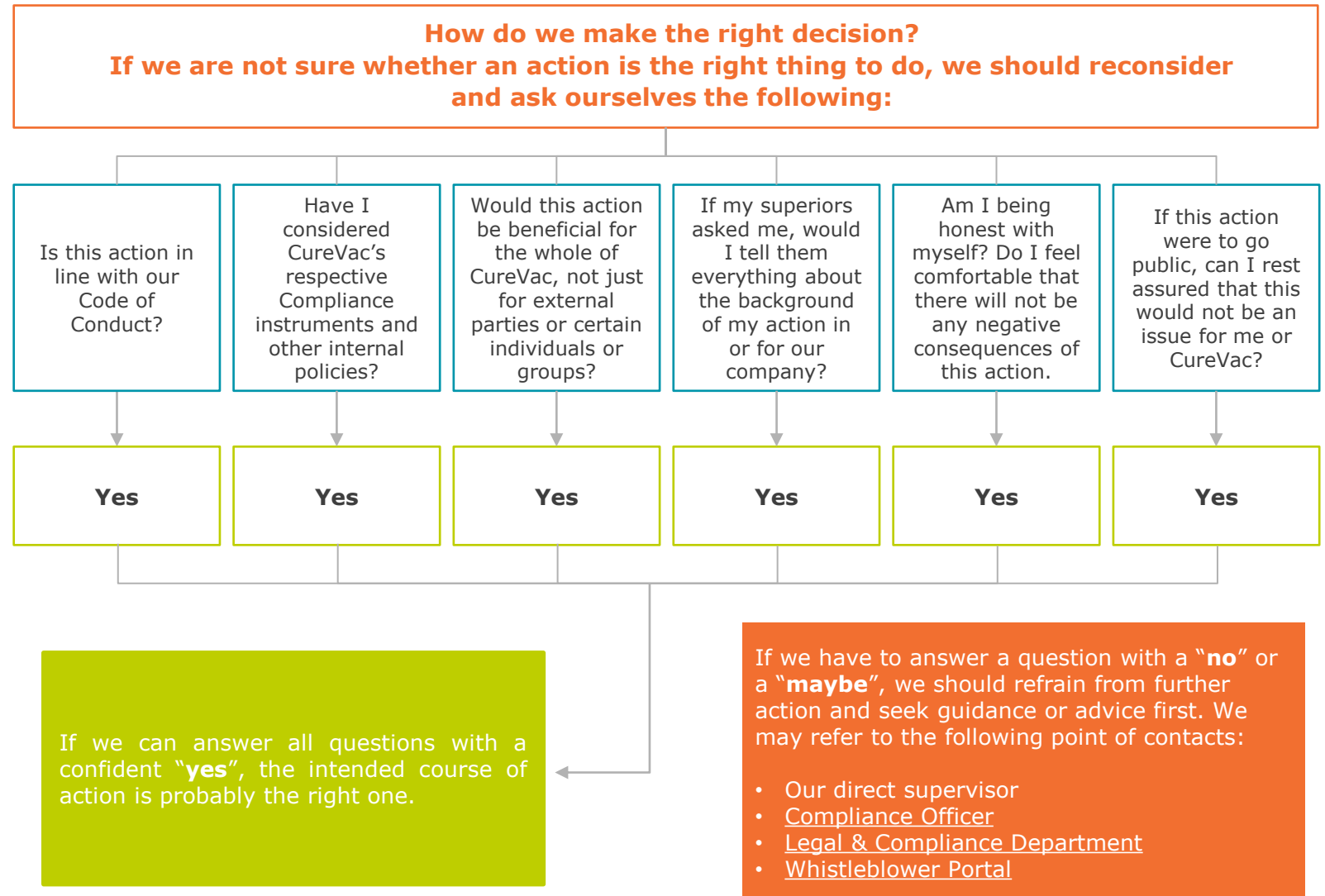
We all – regardless of our position, whether in management, as a scientist or as an intern – must adhere to our corporate values and abide by the rules of this Code of Conduct.

CureVac takes potential violations of this Code of Conduct very seriously. Code of Conduct violations may result in disciplinary action, up to and including the termination of employment.

## What is expected from us?

### As the RNA people, we are expected to:

- **Know our Code of Conduct.** We must comply with all applicable laws, regulations, Compliance instruments and other internal policies, and act in accordance with our corporate values and principles at all times. We therefore need to read and understand the Code of Conduct.
- **Ask for help.** If we are not sure how to act in a particular situation or have questions that our Code of Conduct may not directly answer, we ask for guidance and help.
- **We are trustworthy and follow good judgment.** Regardless of our specific position, we must all act honestly and ethically in everything we do.
- **Treat others with respect.** We need to respect and embrace different opinions and maintain respectful behavior, both internally and when dealing with business partners or other organizations.
- **Stay alert and report concerns when necessary.** If we become aware of a situation that violates our Code of Conduct or our policies or is against the law, we are courageous and speak up. We should never intentionally disregard a potential violation that could harm our company.
- **Be one team and act as a team.** We – the RNA people – are expected to work closely together, communicate with each other, share ideas, discuss issues and help each other.



## Our workplace environment

Without a healthy and trustworthy workplace environment, we would not be able to perform our innovative excellent research and develop the most effective products. Therefore, we need to create an atmosphere of trust, inclusion and respect for ourselves and our dear colleagues.

We value diversity, different opinions and care for each other, no matter the age, gender, sexual orientation, ethnic background and religious belief.

## Our credo

We are one team and work together side by side with mutual respect **and dignity**.

- **We won't tolerate harassment and discrimination!**
- **We prohibit conduct that creates an intimidating or hostile working environment!**

## What is harassment?

Harassment is conduct that creates a disrespectful, hostile, humiliating, disrespectful or offensive environment. Harassment is about impact – how others may be offended by an action – not the intent behind it.

**Harassment is never tolerated at CureVac!**

## Collaborative spirit and equity

We might work in different entities, but we share the same vision, aims and passion.

## How to live up to our values and promote a thriving working environment for everybody:

- We promote fairness and equity.
- We treat each other with respect and dignity.
- We welcome ideas and opinions from other people.
- We are supportive and offer help whenever needed.

**Whenever we become aware of any behavior that is contrary to our values and principles, we speak up!**



## How we treat our suppliers and business partners matters

We depend on our suppliers and business partners, and our suppliers and business partners depend on us as well. We place trust in each other and value our business relationships. That means we work together honestly, fairly and with respect.

### How to maintain a fruitful business conduct with our partners:

- We communicate in a professional manner.
- Our interactions are conducted with integrity.
- We only share accurate information – we never give misleading or false statements.
- We comply with all applicable medical, legal and regulatory standards, and request our business partners to do the same.

## Our shareholders expect excellence

Our shareholders trust us through their investment. In return, we engage with our investors in a transparent and respectful way.

### How to sustain a trustworthy relationship with our investors:

- We provide good corporate governance and live up to our values and standards.
- We provide honest and accurate information with regard to our material operational activities and milestones as well as our financials.

## Q&A



### Question

I overheard my coworker on the phone with one of our current strategic partners. He provided inaccurate information to them about the results of a preclinical development phase. I would like to contact them again and rectify the details.

### How should I react?

### Answer

Sharing inaccurate information is a violation of our Code. Therefore, I should immediately contact the Legal & Compliance Department. The Legal & Compliance Department will help me evaluate the situation and (if necessary) determine next steps, e.g., contact the business partner and correct any misleading or false information.

We – the *RNA people* – strive for sustainability and are committed to ethical business. We seek to obey and promote sustainability, environmental protection, animal welfare, and respect for human rights. In line with our corporate philosophy and values, we strive to reduce our carbon footprint, because, as *RNA people*, we have a mission to serve humanity through our healthcare products. As such, we will seek to align our actions and policies with the United Nations Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct and the applicable supply chain legislation.

Therefore, we recognize the importance of environmental, social and governance (**ESG**) concerns as a key element of our production and business model, and ESG compliance is considered in the selection and development of business relationships with our suppliers.

Human rights or environmental violations in our company or supply chains would also damage our company's reputation in the public eye and may result in severe penalties and exclusion from public contracts under the applicable supply chain legislation.

As a company that values sustainability, it is important to us that we comply with the respective local standards in the area of human rights and environmental standards in our global supply chains, if these local standards are at least equivalent to the minimum international standards.

Human rights and environmental standards under the applicable supply chain legislation include standards such as, for example, the prohibition of forced and child labor, occupational health and safety, appropriate working hours, decent wages, equal treatment, diversity and inclusion, freedom of association, life, health and healthy living, illegal deprivation of land or water, and local environmental standards that must be complied with in the production country.

## We respect human rights and environmental standards

- We embrace human rights and environmental standards when researching our RNA products, manufacturing our products and in all our other actions, policies and business relationships.
- We comply with local working conditions, animal welfare and environmental standards at CureVac and throughout our supply chains, and we support our suppliers in ensuring safe and healthy workplaces and protecting our environment.

## How can we help to comply with human rights and environmental standards?

If we become aware of any suspected violation of human rights, animal welfare or environmental standards at CureVac or in our supply chain, we report these violations and speak up! With regard to animal welfare, a report can also be made to the animal welfare officer.

## We ask for help

Sometimes, we can avoid critical or unpleasant situations by seeking advice when we are uncertain how to act in the right way. Therefore, ask for guidance whenever you are not sure how to act ethically and with integrity in certain situations.

## We report concerns

Speaking up and reporting a concern takes a lot of courage. It is not easy, in particular, if we have just seen or have (over)heard something that triggers a disturbing feeling in us without having any hard evidence to prove it.

Nevertheless, our sense of right and wrong is essential for our company. Any concern that is reported in good faith allows our company to react adequately by either remediating misconduct that has happened already or – in a best case scenario – even detecting potential misconduct before it takes place.

Therefore, we should always raise our voice, whenever we have sensed any potential violation of our Code of Conduct, our policies or the law. It is our responsibility to live up to our values, to contribute to fair and trustworthy business conduct, and to retain a prosperous working atmosphere. All *RNA people* may also seek the support of employee representatives (Works Council) in such matters.

That is why we speak up whenever any of our values appear to be endangered.



## Where can we go to?

**At CureVac, we have several points of contact we can turn to.**

### We can:

1. Speak to our direct supervisor.
2. Talk to our [Compliance Officer](#).
3. Report confidentially via the reporting tool ([Whistleblowing Portal](#)) available on the intranet page of the [Legal & Compliance Department](#).

For more information we may refer to our [Whistleblowing Policy](#).



## How to speak up?



## No retaliation

A person's reporting in good faith is essential to ensure high standards of ethics and integrity, and therefore, helps us to maintain trust in our partners, employees and our Company. Therefore, CureVac strictly prohibits retaliation of any kind against anyone who reports a concern in good faith. Even if the allegations cannot be verified, the reporting person enjoys CureVac's full protection.

## Did you know?

In order to encourage us to engage in our "speak-up policy", CureVac defines the term retaliation very broadly. At CureVac, retaliation is understood as any action that might prevent an employee from reporting a concern. CureVac's understanding of retaliation is, therefore, not limited to demotion, firing, reduction of salary, threats or other forms of harassment, but also covers unpleasant job reassignments or performance reviews.



**We are Accountable**

## We avoid conflicts of interest

We are expected to act in the best interest of our company. This means that the decisions we make on the job must be objective and without even the appearance of a personal interest influencing our decision.

This is not always easy as all of us have personal interests, which is part of our motivation and what makes us unique. To set personal interests aside whenever we come to work and act for CureVac may therefore be challenging. In practice, the boundaries of personal and company interests are easily blurred. For more information we may refer to our [Standard for Conflicts of Interest](#).

## What can I do to avoid a conflict of interest?

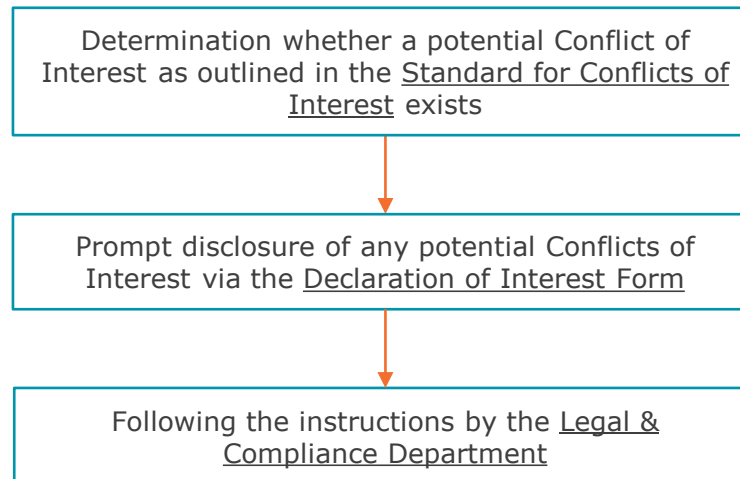
The most challenging part is recognizing a potential conflict of interest in the first place. Often, conflicts of interest are not obvious but hide in everyday situations and may harm our company and cause reputational damage. To be able to act accordingly, it is very important for us to know the types of situations that often lead to a conflict of interest:

**Financial interests** – We should be aware if our investments involve suppliers, customers, competitors or other business partners of our company. In case we are in a position to negotiate or determine the terms of our business relationships with such organizations for our CureVac, we might not be allowed to have any financial interest in those organizations without prior approval from the responsible function.

**Secondary employment** – We should be particularly careful if we are offered a role as director, advisory member or board member for another organization, as such roles likely interfere with our ability to objectively do our job for CureVac. It is, for this reason, prohibited to accept such a position without the consent of CureVac.

**Working with or engagement of family members** – If we have a role in the company that decides on personnel matters, we should withdraw from dealing with issues that involve family members or close friends, as such involvement likely creates the appearance of a preferential treatment due to a personal interest.

### CureVac's three-step process to handle potential Conflicts of Interest:



## Q&A



### Question

I work in the Procurement Department and I am responsible for purchasing materials, products and components for our RNA products. My job requires close cooperation with our suppliers to ensure that they deliver the highest quality. Last week, I had lunch with the CEO of one of our suppliers, and the CEO offered me a position on their company's board of directors.

### Could this be a conflict?

### Answer

Yes, this would be a conflict of interest, as the role of director, board or advisory member for another organization may interfere with our obligations to our company. This is because, for example, a position on the supervisory board of one of our contractual partners – e.g., at a supplier – means that we are no longer completely independent when concluding contracts. Therefore, we should generally avoid sitting on the board of a supplier or customer, particularly when we deal with them on a regular basis in our professional capacity. In any case, we must disclose the intended service/activity and ask for approval from the responsible function.

# We comply with all regulatory and quality requirements

We – the *RNA people* – are dedicated to scientific excellence and finding and implementing solutions which improve the health and well-being of people worldwide.

To this end, and to earn and maintain trust in our RNA products and technology, we ensure that all our research and development activities and manufacturing and supply activities comply with all applicable legal, regulatory and quality requirements and our internal policies and standards.

## Research and Development

It is part of our corporate-DNA that all our research and development activities live up to our dedication for scientific excellence. We are therefore committed to conducting all our research and all our pre-clinical and clinical development following the high medical, ethical and scientific standards, and in full compliance with all applicable laws, regulations and guidelines.

## Manufacturing and Quality

The quality of the products is key to delivering on our goal of improving the health and well-being of people and patients and to ensuring the safety of clinical trial participants.

Therefore, we strive to comply with the highest quality standards and ensure that we conduct our own manufacturing operations in full compliance with all applicable laws, regulations and good manufacturing practices and standards (**GMP**). We apply rigorous controls so that our partners who manufacture or supply products for us live up to the same standards to which we hold ourselves accountable.

## Data Integrity

The integrity and quality of the clinical data from our sponsored studies is essential to ensure that our regulatory submissions are founded on data of the highest quality.

To achieve this goal, we always record all data in a manner that it is:

- attributable, meaning that it is clear who recorded the data is known;
- legible, meaning that that it can be reliably read, viewed, or used;
- contemporaneous, meaning that it was recorded at the time of the event;
- original, meaning that it is the source or authentic record and not an unauthorized copy; and
- accurate and complete.

## Patient and Trial Participant Rights

Participants in trials sponsored by us and patients using our products put their trust in us. All our activities must always have a clear focus on protecting, and improving, the safety and well-being of study participants as well as respecting the rights of patients.

If any of us becomes aware of any adverse event or adverse reaction that could be associated with any of our products or product candidates, he or she must immediately report it to the pharmacovigilance team in accordance with our **SOP Collection and reporting of safety-and quality related information**. This applies regardless of whether we learn of such issue in a professional or a private setting, and regardless of whether or not we know or believe that there is a causal link to the use of our product.

Furthermore, we take particular care to ensure that all patient and trial participant data is collected, processed, and disposed of in compliance with the applicable data privacy laws and standards.

We are committed to developing and providing products that are safe, efficacious, and of the highest quality, and to protect the safety and well-being of patients and trial participants. We are all responsible for reporting safety, quality, and performance issues concerning our activities or products, no matter how we learned of the issue.

**Remember: We speak up!**

# We interact ethically with healthcare professionals and patients (1/2)

We are committed to the highest standards of ethics and integrity particularly in our interactions with healthcare professionals and patients. We earn the trust in our products and our company through our uncompromising dedication to quality and excellence. We will not tolerate any illegal or unfair activities, or the use of improper influence on healthcare professional or patients, to promote our products and services.

## Interactions with healthcare professionals

As part of our work, we interact with healthcare professionals and may rely on their services for, among other things, our research and development, or educational and promotional activities.

When doing so, we act with integrity and transparency and avoid actions that may be perceived as bribing, misleading or otherwise improperly influencing healthcare professionals.

### Services from healthcare professionals

We may request services from healthcare professionals, such as consultancy work or speaker engagements. These interactions are based on high standards of ethics, integrity and fair remuneration for services actually performed:

- We will only engage healthcare professionals for services for which we have a legitimate business need. We will never request services or pay a fee to a healthcare professional in order to influence their medical judgment or their prescription or purchasing decisions, or those of their employing institutions.
- We will compensate services at fair-market value only.
- We ensure that the engaged healthcare professional complies with all applicable laws and professional standards.

### What is a healthcare professional?

Any person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of his/her professional activities, may eventually prescribe, purchase, supply, recommend or administer one of our products.

### Information, promotion and scientific exchange

- We inform healthcare professionals about our products and our activities in an accurate, fair and balanced manner that enables them to form their own opinion on the therapeutic value of our products.
- In all our communication about our products, we fully comply with all advertising and promotion restrictions under applicable laws, regulations and industry codes.

## Q&A



### Question

I sit next to a doctor at a conference for cancer immune therapies. We talk about our new promising RNA method, but he seems unpersuadable and prefers other therapy options. Since I supervised the (successful) first clinical phase, I want to convince him about our method.

### Should I continue talking about it?

### Answer

While being passionate and convinced about our work, we should always respect the opinion of other healthcare professionals. We must especially never improperly influence them, as they are experts in their fields themselves. We have to trust that their decisions are made in the best interest of their patients.

# We interact ethically with healthcare professionals and patients (2/2)

## Interactions with patients

Improving the well-being of patients is at the center of what we strive for. Feedback from patients and patient organizations is therefore highly valuable for our work. We recognize that they have unique interests and experiences. When we interact with patients and patient organizations, we do so respectfully, listen to them and inform them, but never improperly influence their views, decisions, missions or policies.

## Gifts and hospitalities

In general, we do not offer, promise or grant any gifts or other advantages to healthcare professionals, healthcare organizations, patients or patient organizations, because gifts or other benefits present an inherent risk of being perceived as influencing the recipient in their decisions or views with respect to our products.

However, in certain circumstances it may be appropriate to provide appropriate, modest hospitality or grant other modest advantages. In order to avoid ambiguity as to what hospitality or other advantages may be granted, we grant hospitalities or advantages only to the extent that they are explicitly allowed under local laws and our respective guidelines, such as the [Anti-Bribery, Corruption and Conflict of Interest Policy](#). When in doubt about whether a hospitality or other advantage is appropriate, please contact the [Legal & Compliance team](#).

## Transparency

We value transparency and fully comply with all applicable laws, regulations and industry codes that require disclosure of transfers of value to healthcare professionals, healthcare organizations patients or patient organizations.



No gift, payment, hospitality or other advantages may be granted to healthcare professionals, healthcare organizations, patients or patient organizations without the approval of the Legal & Compliance Department. In doubt, we will contact our [Legal & Compliance Department](#) for further advice.

**Remember: We speak up!**

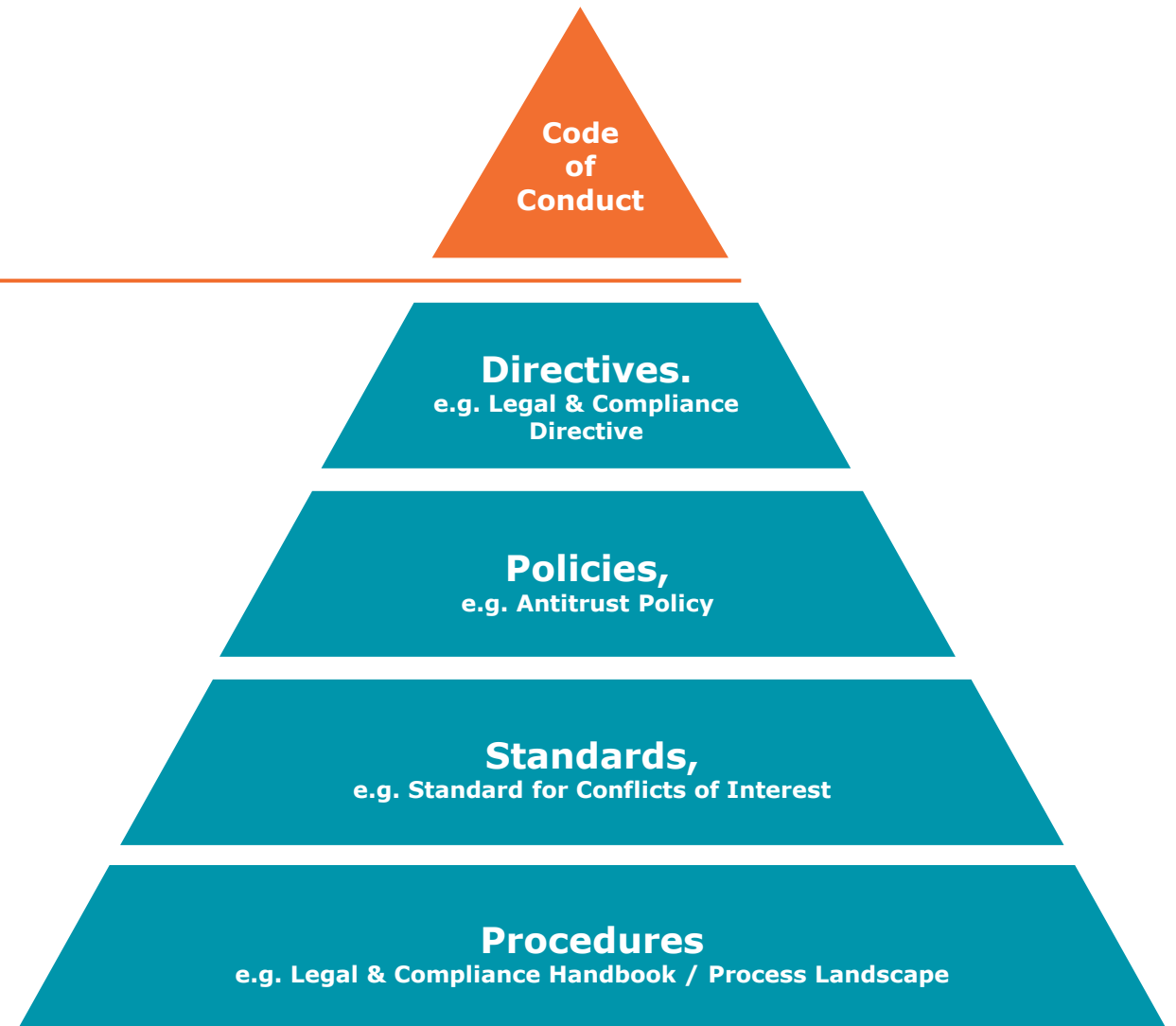
**We Follow the Letter and Spirit of the Law**

The Compliance Management System at CureVac as well as the respective obligations of the *RNA people* are set out in a number of Compliance instruments.

The Compliance instruments of CureVac follow the principles of vertical and horizontal integration. This means that each Compliance instrument is based on the one above and aligned with the other Compliance instruments on the same level.

The **Code of Conduct** is at the top of the hierarchy. We must act in accordance with the Code of Conduct at all times.

The Code of Conduct is specified in more detail in other Compliance instruments, especially in Policies and Standards.





## Our responsibility (2/2)

We follow all the laws and regulations applicable to our company.

We also observe our own Compliance instruments or other applicable internal regulations.

We know our Compliance instruments and other internal regulation to ensure that we conduct our business in a lawful manner.

### How do we ensure Compliance?

Whenever we are uncertain regarding legal issues, we read the relevant Compliance instruments. In case of doubt, we ask our Legal & Compliance Department for advice.

### Which Compliance instruments should I be aware of?

- [Anti-Bribery, Corruption and Conflict of Interest Policy](#)
- [Standard for Conflicts of Interest](#)
- [Antitrust Policy](#)
- [Export Control Policy](#)
- [Insider Trading Policy](#)
- [Whistleblowing Policy](#)
- [Data protection Guideline and supplementing data protection policies](#)

All Compliance instruments are available via the intranet page of the [Legal & Compliance Department](#).



# We fight bribery and corruption (1/2)

## We won't tolerate bribery, corruption and fraud

In any of our actions, we always act in accordance with the applicable anti-bribery, anti-corruption and anti-fraud laws no matter where in the world we work. We – the *RNA people* – believe that our success is based on the quality of our products and services, and never on unethical or illegal behavior.

We do business in a transparent and ethical manner. It is on us to speak up and report any suspicion of bribery, corruption or fraud and to have transparent conversations to assess situations that bear a higher risk of bribery, corruption or fraud.

## We are committed to zero tolerance regarding bribery and corruption

As a company, we – the *RNA people* – support free competition among RNA manufacturers and distinguish ourselves from competitors through the quality of our products and services.

We therefore have a zero-tolerance policy with regard to bribery and corruption, as such behavior – or even the suspicion of the same – is not in line with our values and can damage the reputation of our company as well as lead to severe penalties and fines.

Bribery and corruption can occur in a variety of ways and situations. In particular, bribery in commercial practice in the healthcare sector or in dealings with public officials is a criminal offense.

## We won't accept and offer bribes in the commercial context

First of all, we must ensure that we do not engage in bribery and corruption in business dealings with other companies.

We would be committing a criminal offense if we (directly or indirectly) offer, promise or grant an inappropriate advantages to an employee or agent of another company or a third party as consideration for influencing a decision or violating their duties toward their company in the context of purchasing goods or services from us.

It is equally prohibited for us to demand, allow ourselves to be promised, or accept an inappropriate advantage for influencing a decision by our company to purchase goods or services, or in return for breaching our duties toward our company.

## What qualifies as an inappropriate advantage?

The threshold may vary from situation to situation.

The general rule is: An advantage is inappropriate if an objective third party may regard the advantage as significant enough to influence a business decision. This may apply, for example, to invitations to shows, trips, lavish dinners or gifts that exceed a minimal value, it can also include such things as employment opportunities or internships for friends and relatives.

## We do not illegally influence public authorities

We cooperate closely with public authorities during the development, production and export of our RNA products, especially in the area of approval and monitoring of our products. This is an extremely sensitive area, and it is very important for our company's reputation in the public perception that we are transparent in our dealings with governments, members of parliament and any other public officials.

### How we live our zero-tolerance policy

We never unlawfully influence decisions or acts by business partners, public officials or healthcare professionals!

# We fight bribery and corruption (2/2)

Directly or indirectly offering, promising or granting an inappropriate advantage to a public official in consideration for the performance (or omission) of an official duty constitutes a criminal offense. The offense is even more severe if the public official also violates their official duties. Illegal influence also includes facilitation payments to public authorities or officials and such payments are therefore prohibited. Remember that in many if not most countries, healthcare providers are considered public officials.

### Liability of our company

We as a company can also be subject to significant penalties and fines for bribery and corruption violations committed by our employees.

Further details on the subject of bribery and corruption are set out in our [Anti-Bribery, Corruption and Conflict of Interest Policy](#).

**Remember:** It is important that we and our company keep accurate records of all financial transactions (see also pages 38-39).



### Q&A



#### Question

One of our colleagues suggests that, as a promotion strategy, we approach doctors who vaccinate in their practices and offer these doctors a tablet so that they will always recommend and use our vaccines.

#### How should we respond?

#### Answer

We reject the proposal and end the conversation immediately. Offering a tablet in consideration for the anticipated preferential use of our vaccine is a textbook example of an inappropriate advantage to a healthcare professional. In addition, we should report the incident to our Legal & Compliance Department.

**Guidance:** If we are not sure whether offering or accepting a gift, an invitation or another advantage is permissible, we can always refer to our [Anti-Bribery, Corruption and Conflict of Interest Policy](#).

In case this policy does not answer our questions, we may at any time contact our [Legal & Compliance Department](#) for further advice.

**Remember: We speak up!**

## Responsible handling of personal data is crucial to our scientific success

Our scientific work in the RNA sector is data-driven. The personal data we process with regard to our research patients is a key element of our scientific success. Therefore, we must safeguard and protect such personal data to the best we can. The same applies to personal data of our employees, business partners and other individuals we process.

## What is personal data?

The scope of the term **personal data** is very broad. Any information that could be used to directly or indirectly identify individuals, such as name, date and place of birth, address, email address, government or insurance identification number, online identifiers and data linked to such identifiers, is regarded as personal data. Therefore, many types of data we handle in our daily practice – from trial subject data to employee payroll information – are personal data.

## What are special categories of personal data?

Some types of personal data are afforded a higher protection due to their sensitivity and the potential higher risk for concerned individuals. In particular, patients' health records and other health information such as clinical trial data, genetic and biometric data and any personal data revealing racial or ethnic origins are considered special categories of personal data and their processing is subject to even stricter regulations around the world that include even harsher adverse consequences in case of their violation.

## What rights do individuals have in regard to their personal data?

Individuals have a number of statutory rights in regard to their personal data. Depending on the specifics of their relevant jurisdiction, these can include the right to inquire about and access their data, the right to have such data corrected or deleted, the right to object to the data processing and even the right to have their personal data ported to another entity.

## How do we handle personal data?

Regardless of our role in our company, we are all responsible for handling personal data with due care and in compliance with the requirements of applicable data protection laws and regulations.

That means in particular:

- We are acting **lawfully** – we only process personal data in a lawfully and fair manner and in particular only where we can rely on the individual's consent or a statutory legal basis for the processing.
- We are **purpose-driven** – we only process personal data for specified, explicit and legitimate purposes and do not process personal data in a manner that is incompatible with those purposes.
- We are **minimalist** – we only collect the personal data we need to achieve our business goals and legitimate processing purposes, and we only keep personal data in a form that permits identification of individuals for no longer than is necessary for the purposes for which the personal data are processed, unless specifically authorized by law.
- We are **transparent** – we always inform our clinical trial subjects/customers/employees and other concerned individuals in particular about what personal data we process, why and on what basis we process it, to which recipients we transfer personal data and how long we intend to keep such data before deleting it.
- We are **protective** of personal data – we ensure that personal data is not misused, falsified or disclosed to unauthorized persons (within or outside our company) and that personal data is always processed and kept in a manner that ensures appropriate security.
- We ensure **accuracy** – we ensure that personal data is accurate and, where necessary, kept up to date.

## What is important when personal data is disclosed or shared?

Personal data may not be freely shared with any third-parties outside the company. In case we need to engage third-parties to process our data on our behalf, we will have to conclude specific processing agreements that ensure adequate protection of the data. Please note that third-parties also include all legally individual companies of the CureVac Group, as usually data protection regulations do not provide privileges to groups of entities in this regard (i.e. the regulations for data transfers apply regardless whether the recipient company is within the same group of entities or not).

In case personal data needs to be disclosed to third-parties (including other companies belonging to the CureVac Group) which process the disclosed personal data for their own purposes (rather than on our behalf), including to law enforcement or to health and safety bodies or to other regulatory authorities, it is our responsibility to make sure such disclosure is lawful and that an appropriate legal basis for such disclosure exists. We will therefore always include the Data Protection Officer (DPO) and his team in these circumstances, before any personal data is handed over to anybody outside the CureVac Group.

Additional requirements need to be complied with in case of cross-border transfers of personal data.



## What else do we need to consider – especially with regard to personal data of clinical trial subjects?

As a science-based company, we depend on the integrity of our data. In other words, the way we manage our data will impact our research ability. We therefore have to ensure that the data we store is accurate. Only accurate, complete and trustworthy data records enable us to meet the highest research and product quality standards that we as *RNA people* stand for.

Also, in regard to our clinical research, we must be aware that many jurisdictions provide specific regulations in regard to how the research data may be generated, how it must be safeguarded and how it may be used further on. Therefore, we ensure that all applicable legal requirements will be complied with in an adequately documented matter, in order to allow for optimal future use of our research data.

### What do I do if...

I become aware or suspect any unauthorized disclosure or misuse of personal data?

- Report your suspicion immediately to our [Data Protection Officer](#).

I have a specific question regarding data privacy or any applicable statutory or regulatory provisions (such as the EU General Data Protection Regulation, GDPR)?

- Contact our Data Privacy Officer and his team under [datenschutz@curevac.com](mailto:datenschutz@curevac.com).

I want to learn more about our handling of personal data?

- Refer to our [Data Protection Guideline](#) and [further data protection policies](#) and participate in privacy trainings.

# We compete fairly (1/2)

## We need fair competition

Our scientific research, our products, our patients and our company benefit from a competitive marketplace that adheres to the principle of fair competition within legal boundaries.

## Legal boundaries of fair competition

Antitrust and competition laws pursue two objectives.

**Antitrust laws** promote unrestricted competition among us and our competitors; prevent collusive interactions such as price fixing, bid rigging, market allocation and supply restrictions; and allow new companies to enter the market. Antitrust laws also apply to vertical agreements with distributors and suppliers and prohibit collusive arrangements such as resale-price fixing or territory restrictions. In addition, antitrust laws prohibit the abuse of a market-dominant position.

**Competition laws** protect consumers by ensuring fair business practices within our direct product distribution and sales structure. A company must in particular not perform any actions that may mislead consumers. Competition laws also include provisions on advertisement, on the protection of competitors, as well as on unacceptable harassments of consumers. In the end, acting fairly on the relevant market towards consumers also fosters fair competition between competitors.

Our [Antitrust Policy](#) provides guidance and helps us navigate safely through the applicable Antitrust and competition laws.

### Example:

Antitrust laws prevent two biopharmaceutical companies from reaching mutual agreements, such as price agreements for drugs that both companies are producing. Competition laws ensure that both companies abide by the rules so that there is a functioning competition, which ultimately leads to individuals paying fair prices for drugs.



Knowing that everyone, particularly our patients, will benefit from fair competition, we will follow antitrust and competition laws in all markets where we operate and avoid any appearance of unfairly restricting the market dynamics.



## We collect competitive intelligence ethically and lawfully

In the field of medical research, we depend on information and knowledge. We always gather our information fairly, legally and transparently, by adhering to the following rules:

- We only use public or other permitted sources (e.g., newspapers and websites) for our market intelligence research.
- Whenever and wherever we gather information, we are transparent about who we are and whom we work for.
- We do not exchange competitively sensitive information (e.g., on prices, costs, customers, sales volumes, production capacities, etc.) with competitors.

## How do we help to promote fair competition?

- **We never** enter into any agreement or concerted practice with competitors to fix prices or conditions on our products, nor do we allocate markets, territories or customers with our competitors or agree on restricting supply.
- **We never** prevent our competitors from entering the market. All medical companies should have the same goal – the well-being of humankind. We are particularly cautious in markets where we have a strong position and do not hinder competitors or exploit customers or suppliers.
- **We are always cautious** during medical conferences, trade associations and other industry gatherings. We never discuss and exchange sensitive business information such as insights regarding our medical research, clinical trials, product pricing, or promotional and marketing strategies.
- **We deal honestly and fairly** with our customers and patients. We are truthful about our products and never take advantage of our customers or patients by providing misleading or deceiving product information.
- **We follow** our respective guidelines such as the **Antitrust Policy**.
- **Whenever you are in doubt** as to the legality of a proposed behavior, **reach out to our Legal & Compliance Department**. Any misconduct with regard to antitrust and competition laws has tremendous negative effects on our reputation and may lead to significant fines for our company and potentially the persons involved, claims for damages from customers or competitors, exclusion from public tenders, and negative press.



## International trade laws/sanctions/embargoes

These are imposed by governments and international organizations, including the UN and the EU, around the world to support their economic, strategic or national security interests. In order to provide our RNA products and services to patients and vaccines worldwide, it is important that we comply with all applicable customs, import and export sanctions, and as the case may be, anti-boycott laws and regulations (**Trade Laws**) of the countries in which we operate. Failure to comply with these Trade Laws may result in civil and criminal liability as well as loss of export privileges.

## What does this mean for our business practices?

It is our personal responsibility to know the relevant Trade Law restrictions that may apply to our business operations and dealings with customers or business partners. In other words, if we are responsible for or involved in the sales, movement and/or delivery of our RNA products (including ingredients, pre-made or finished products, etc.), people, services, technology or money across international borders – especially non-EU borders – we have to ensure that we comply with the Trade Laws of the countries in which we do business and that we do not violate, inter alia, US or EU sanctions or embargoes.

**Good to know:** Our [Export Control Guideline](#) provides guidance and helps us navigate safely through the applicable trade laws that may be relevant to our company's day-to-day business.

**We are expected to** respect the applicable Trade Laws by carrying out the following:

- Screening our current or future business partners and customers to make sure they are not on national or international sanctions lists applying to the transaction in question.
- Verify which country a particular delivery is made or a transaction relates to in order to determine potentially applicable sanctions, including US or EU sanctions.
- Ensure that all items delivered abroad are accurately export control and customs classified in order to ensure compliance with export control and sanctions regulations.
- Observe restrictions and all other requirements related to the import, export or delivery of items.

Further details are set out in our [Export Control Guideline](#).

Did you know that US sanctions may apply to the following?

- All US persons (citizen, permanent resident and companies) in the US and abroad
- US goods (commodities, software and technology)
- Transactions through the US financial system (including transactions in US dollars)



**Guidance:** For questions regarding cross-border transactions, please contact our [Legal & Compliance Department](#).



## We prevent money laundering

We do not look the other way when it comes to illegal activities. However, some criminal activities like money laundering are often not obvious and are hidden in the presumed day-to-day business. This is the reason we should be particularly sensitive to any red flags that might link a payment to a criminal background.

## What exactly is money laundering?

Values generated through criminal activity – like drug dealing, tax evasion or fraud – are moved through legitimate businesses with the aim of hiding their criminal origin. Terrorism financing refers to any type of financial support for a terrorist organization, whether or not from illicit activity, that can also be linked to money laundering. Although money laundering offenses are often conducted unintentionally, countries have imposed significant punishment not only for intentional but also for negligent misconduct.

## How can we prevent money laundering?

It may not be obvious whether money originated from a legitimate source. Therefore, it is crucial to learn as much as possible about the source, background and origin of the money our company intends to accept.

In order to prevent money laundering, we should follow certain ground rules:

- Never accept cash payments, as we cannot trace the origin of the cash.
- Never transfer money to or accept money from private bank accounts of business partners or third parties to conceal or hide a transaction.
- Always verify the identity and credentials of potential customers, business partners and other third parties before entering into contracts or business relationships.

**If we detect any red flags that indicate money laundering, we must reach out to the Legal & Compliance Department for guidance before we proceed with the affected business activity.**

## We must be alert in the following situations:

- We are requested to transfer payment to or from entities and countries that are not related to the business transaction.
- We are requested to book a payment that does not follow our regular internal processes (e.g., invoice clearance).



## What we need to know about fraud and how we can prevent it

### What is fraud?

Fraud is prohibited worldwide. The criminal laws of various countries may have different definitions of "fraud." Based on our broad understanding, fraud includes the intentional deception of a person, company or organization to obtain an unauthorized advantage, which may be money, property, services or a similar advantage.

### What are the dimensions of fraud?

Fraud has multiple different dimensions that we must prevent and be aware of, for example:

#### 1. We prevent fraud from within our company to the detriment of third parties

We must always be truthful about the effectiveness of our products. The same applies to our data records of clinical trials or clinical research patients. We do not sugarcoat values or products, and we are transparent and communicate only facts.

#### 2. We prevent intra-corporate fraud that will harm our company

Our company offers a lot to us. Let us be faithful in return. When we submit, for example, our business travel claims, we submit only our actual costs, attach the appropriate receipts and check our submission for clerical errors.

#### 3. We prevent our company from being a victim of fraud – keyword: cybercrime

The economic damages caused by cyberattacks on companies is tremendous and on the rise. The attackers constantly develop new cybercrime tactics and put these into practice.

We must be aware of these kinds of attacks and protect us and our company assets in the best way possible, such as via our IT security network. But the IT security network is only one facet of protection. We as users must be sensitive to the potential cybercrime scenarios in our daily business as well.

#### Cybercrime and terrorist financing

We would never intentionally finance or support a criminal and terrorist association. However, financing of terrorist associations is often related to cybercrime and turns the victim into the perpetrator, either because the cybercriminals deceive the victim into making an unwanted payment (e.g., payment to a false bank account based on forged invoices) or any payments issued in the course of a ransomware attack. Be careful: Both situations may constitute criminal offenses. This also demonstrates the importance of cyber security for CureVac.

### How can we prevent fraud, cybercrime and terrorist financing?

#### Most important: We speak up!

If we suspect fraud or similar criminal acts, we contact our direct supervisor and involve the Legal & Compliance Department.

To avoid cybercrime attacks,

- **we do not open suspicious emails**, we do not click on links sent by unknown senders, and we do not install programs without prior clearance from our IT Department.
- **we are cautious and check twice** – Illegal harvesting of information often occurs hidden on sites that look like the original but are in fact fake.
- **we update our software** as recommended and **change our passwords** regularly.
- we **handle** our technical devices with care. In case of theft, we immediately inform our IT Department.
- we attend our **respective trainings**.

Cybercrime attacks pose great risks to our company. Therefore, we are all urged to be perceptive and report any incidents or suspicions to our IT Department.



**We Protect CureVac**

# How to use and protect our company assets

## What exactly is meant by the term "company asset"?

The ideas and technologies we at CureVac develop, the facilities we use to research, the technology that connects us with others, the communication we exchange via emails, the computers and mobile devices CureVac offers us to perform our duties, etc. are all understood to be **company assets** that we need to protect.

## How can we protect our company assets?

There are various ways to protect our company assets.

### ▪ Physical (including electronic) company assets:

All resources that are made available to us (e.g., computer, mobile phone, company car, etc.) must not be lent, sold or given away unless we are authorized to do so. Besides that, we take good care of the company assets provided to us and never leave our computers or mobile phones unattended in public spaces. Also, we ensure that our electronic key cards cannot be used by anyone else. In the event of loss or theft, we immediately inform our [IT Department](#). Furthermore, we utilize our electronic devices for business only. For further information regarding permitted IT use at CureVac, please refer to our [IT Policy](#).

### ▪ Intellectual property:

As a medical research company, our most valued goods are the technologies, trademarks, patents, knowhow, experience and ideas we develop — in short, we must fiercely protect our intellectual property. We don't discuss ideas or inventions with others, as we might disclose confidential information. This obligation may even last beyond our employment relationship with CureVac. In this regard, please remember that CureVac continues to own any work product, idea or technology we develop during our employment relationship.

We adhere to our IT Policy and never share login data and/or passwords to protected systems.



We do not use company assets for external business or other personal gain.



We do not use company assets, such as computers, for illegal or unethical activities (e.g., file sharing).



When leaving our company, we must return all CureVac-owned equipment like technical devices, company documents, access cards, tokens and other company-owned assets.

## Q&A



### Question

I broke my mobile phone and our IT Department provided me with a new phone. I was not immediately asked to return the broken device; may I just keep it and even sell it at a later point in time?

### Answer

Personal use of company-owned technical devices is prohibited. The mobile phone also remains company property and must be returned to our company even if it is defective.

### Question

I work in the laboratory. My daughter has a science-based research project in school and wants to prepare and view some samples under the microscope. Am I allowed to borrow some equipment (platelet, pipette, etc.) over the weekend?

### Answer

It depends. Any use of company-owned assets like this for personal reasons would require approval from my supervisor or the Compliance Officer.

# We do not engage in insider trading (1/2)

## We play fair!

Insider trading is the embodiment of unfair business conduct and endangers our company. It is illegal if we buy and sell securities based on material nonpublic information regarding our own company or from other companies (inside information). We may therefore not engage in securities trading with respect to companies or disclose such information if we have acquired special knowledge that is not publicly available as a result of our work for our company that we only became aware of due to our work for our company. We believe in the balance of securities trading, which is only possible because everyone has to abide by the same rules. It runs counter to these rules if we trade with special inside knowledge or pass this special inside knowledge on to third parties so that they can trade with it.

Taking advantage of our privileged access to inside knowledge of our company or our company's business partners is considered as breach of our fiduciary duty toward our company and opens us up to severe penalties.

### But what exactly is considered as insider information?

A lot! Just to name a few:

- Any information with regard to earnings release (prior to the official earnings release)
- A planned merger or acquisition
- Information on material study data, the introduction of a new product, a new major customer or a new important business partner
- Any information with regard to legal matters (in particular, but not limited to litigation matters)



# We do not engage in insider trading (2/2)

## Am I an insider?

### How do I know for sure?

We all may potentially be exposed to information concerning our company, our company's business partners or even our competitors that are not (yet) publicly available. However, if such information were known to the public, the (trading) public might act on such information, e.g., sell or buy company stocks or other securities. That said, we all may be insiders if we come into contact with highly valuable confidential information.

Apart from the information that we might learn by coincidence and that may turn us into insiders, our company has defined two basic types of insiders – Permanent and Temporary Insider.

Specific positions in our company are regularly in contact with inside information (e.g., member of executive board, head of accounting, head of controlling, etc.) and are therefore categorized as Permanent Insider.

In case we are involved in confidential projects with access to inside information, we may be classified as a Temporary Insider.

In the latter case, however, we have been informed of our special role via email.

Regardless of our respective classification - Permanent or Temporary Insider - we will not engage in securities trading with respect to insider information that we have acquired through our work for our company. We neither trade on insider information ourselves, nor pass such insider information on to others, e.g. family and friends, so that they may trade.

If you are in doubt as to whether information may be considered insider information, please refer to our [Insider Trading Policy](#), the intranet page with [Information for Insider](#) and consult with our [Legal & Compliance Department](#).

## Q&A



### Question

In an internal meeting, I overheard that one of our business partners is going to buy another pharmaceutical company. This merger will transfer a completely new technology to our business partner, giving it a competitive advantage.

I am quite sure that this will cause our business partner's share price to rise rapidly. I don't trade shares myself, but I would like to pass this information on to a good friend. **Any objections?**

### Answer

Yes. This "tipping off" would be considered as illegal insider trading, even if you do not intend to buy the stocks yourself!

**Remember: We all have access to non-public information in our day-to-day business and may hence all insiders.**

## Accurate reporting and accounting

In order to maintain our **good reputation** as a leading researcher of RNA products, abide by regulatory requirements and to avoid **corporate liability**, we must ensure that we correctly handle the **data, information** and **records** we create or for which we are responsible.

How to handle data, information and records:

- ✓ We only share data, information and records that are true, complete and accurate.
- ✗ We never make false or misleading statements or entries in reports, publications or expense reports.

When we operate in the area of reporting and accounting, we must **be familiar** with and comply with applicable laws, internal accounting and reporting standards, and external standards for financial and nonfinancial reporting. We make sure to follow all internal processes and accounting principles so that our records accurately reflect all transactions.

- ✓ We never falsify records or accounts or misrepresent facts. This could be subject to criminal sanctions and fraud.
- ✓ We always record and classify transactions in the proper accounting period and department.
- ✓ In case we have questions, we refer to the **finance and tax team** for help.

Maintaining **accurate corporate books** and **records** is necessary to achieve and build **financial integrity**, as well as to comply with our regulatory obligations.

## Q&A



### Question

I am a medical research team leader and I had to fight hard to secure this year's approved project budget for my team. We were thrifty and did not use all of the budget. I have a new research idea that is not approved/supported by our company; therefore, I would not receive a project budget even if I apply for it. May I just use last year's unused project budget?

### Answer

No. CureVac assigns and approves project budgets. We are not entitled to use project budget surpluses as we please. If a project budget has not been used, we must inform our supervisor so that the budget may be reallocated.

# Accurate records and information (2/2)

## Public communication and disclosure

Since we are a publicly listed company and operate in the sensitive area of medical product development, we share information **carefully** and **only if needed**.

- ✔ We always act **transparently** and disclose information to the public only through the channels designated by the company.
- ✔ We promote full and understandable disclosure in reports filed with the relevant authorities and in other public communications.
- ✘ We are not permitted to make any disclosure of material nonpublic information regarding our company to any person, including friends and family, or entity outside the company.
- ✔ We ensure that personal views are labeled as such when expressing opinions in public and that our actions or statements **do not harm or damage the reputation of CureVac**, its shareholders or employees when appearing in public on behalf of CureVac.



## Q&A



### Question

I saw a post on Twitter about our company that contains incorrect information about our mRNA technology. May I reply online and set the record straight?

### Answer

No. We only comment or speak on behalf of our company if and when we are authorized by the appropriate level of management. We notify the communications team so that the situation can be addressed appropriately.



# We are eager to learn

## We are eager to learn every day

CureVac's mission is to develop a new generation of medicine; to achieve that mission, we have to enhance our knowledge. This is not limited to our scientific research but includes our ethical and legal knowledge as well.

We believe in continuous self-improvement. We learn from our mistakes and constantly try to educate ourselves. The foundation of our company is based on the intrinsic motivation of each individual. We are focused and engaged, and CureVac is determined to support us wherever possible.

Therefore, CureVac offers us a broad spectrum of training opportunities.



### Why is training on Compliance topics so important?

Throughout constant training, we are able to:

- Increase awareness of a wide range of legal and ethical issues
- Understand what is right and wrong
- Sharpen our self-reflection
- Improve our soft skills and thus also the way we interact with each other and with our partners
- Sustain and maintain our ethical culture

### Trainings

We always want to uphold this Code and the rules set forth therein.

Therefore, CureVac offers several (mandatory) trainings on Compliance topics. In order to stay up to date, we are required to periodically refresh our trainings.



# Glossary

## What does our CoC mean when referring to:

**Bribery and Corruption** are in general referred to as acts of influencing the recipient through inappropriate advantages to the benefit of the giver or generally to improperly influencing someone's acts or decisions or violating their duties or obligations. The recipient can be a healthcare professional, a public official, one of our own employees or an employee of one of our business partners. Bribery and corruption are prohibited globally and generally constitutes criminal acts. Further information on this important topic is provided on [page 26](#) and [page 27](#) and in our [Anti-Bribery, Corruption and Conflict of Interest Policy](#).

**Company Assets** include the ideas and technologies that are being developed at CureVac, the facilities used to research, the technology that connects us with others, the communication exchanged via emails, the computers and mobile devices CureVac offers us to perform our duties, etc. Further information on how to protect our company assets is set out on [page 36](#).

**Conflicts of Interest** can arise when personal interests are mixed with the interests of CureVac. Conflicts of interest situations are explained on [page 19](#) and in the [Standard for Conflict of Interest](#).

**DPO (Data Protection Officer)** is the responsible function and go-to person in case of data privacy-related matters. More information is available on [page 29](#).

**ESG** is an abbreviation for Environmental, Social and Governance and refers to the process of achieving and promoting in particular sustainability, environmental and animal protection, respect for human rights, and a reduction of CureVac's carbon footprint. The characteristics of ESG are described in more detail on [page 15](#).

**Fair Competition** means competition that is based on quality, price, and service rather than unfair practices. More information on fair competition is provided on [page 30](#) and [page 31](#) as well as [page 32](#) and in the [Antitrust Policy](#).

**Financial Integrity** is essential to gain the trust of our investors, maintain our excellent reputation and avoid corporate liability. To achieve financial integrity, maintaining accurate books and records is essential. To inform ourselves about financial integrity, we may refer to [page 39](#).

**Fraud** is the wrongful or criminal deception intended to result in financial or personal gain. CureVac has to be protected against fraudulent acts from third parties, in particular in connection with cybercrimes. You can find information on how to prevent [fraud, cybercrime and terrorist financing](#) on [page 34](#).

**Harassment** is conduct that creates a disrespectful, hostile, humiliating or offensive environment. We must prevent harassment from happening at any time. The best way to do so is explained on [page 13](#) and [page 14](#).

## What does our CoC mean when referring to:

**Healthcare Professionals** include any person that is a member of the medical, dental, pharmacy or nursing professions or any other person who, in the course of their professional activities, may eventually prescribe, purchase, supply, recommend or administer one of our products. For guidance on how we interact ethically with healthcare professionals, we can refer to [page 21](#) and [page 22](#).

**Insider Trading** is the embodiment of unfair business conduct. It endangers our company. Insider Trading is illegal if securities are bought and sold based on material non-public information regarding our own company or from other companies. To learn more about what characterizes an insider, we may refer to [page 37](#) and [page 38](#).

**Money Laundering** is the processing of criminal proceeds to disguise their illegal origin. More information on how to prevent money laundering is provided on [page 33](#).

**Personal Data** is understood as any information that could be used to directly or indirectly identify individuals, such as name, date and place of birth, address, email address, government or insurance identification number, online identifiers and data linked to such identifiers. For more information on how personal data is protected, we should go to [page 28](#) and [page 29](#).

**Special Categories of Personal Data** refers to patients' health records, clinical trial data, genetic and biometric data, and any personal data revealing racial or ethnic origins. More information on how to handle personal health information is provided on [page 28](#) and [page 29](#).

**We speak up**, whenever we suspect non-compliance with our ethics and integrity values described within this CoC. Further information on our speak-up culture and the protection that CureVac offers us is displayed on [page 16](#) and [page 17](#).

### Adoption

This CureVac Code of Conduct has been approved by the Management Board of the CureVac NV on 8 December 2022 as a corporate group policy and has been updated on 14 April 2023. It has come into effect upon publication on 9 August 2023 and supersedes all previous versions of the Code of Conduct.

### Ownership and Involvement

Responsible (Document Owner)	Accountable	Consulted	Approved
Compliance Officer	Management Board	Finance and HR Department / Commercial / ESG / Procurement / Corporate Data Protection Officer	Works Council



**Thank you!**